

Code of Conduct

Muller.

INTRODUCTION

Muller Groep BV operates in industries where operational excellence, safety performance and integrity are essential to maintaining trust and long-term partnerships. Our projects support critical infrastructure within the oil & gas sector, offshore wind developments and large-scale industrial operations.

We recognise that our clients, partners and stakeholders expect more than technical capability. They expect disciplined governance, responsible environmental stewardship, ethical conduct and a demonstrable commitment to continuous improvement.

This Code of Conduct defines the principles and standards that guide how we operate internally and externally. It reflects our commitment to structured management systems aligned with internationally recognised standards for quality, environmental management and occupational health & safety.

The Code applies to:

- Employees
- Contractors and subcontractors
- Suppliers and service providers
- Consultants and agents
- Joint venture partners
- Any party acting on behalf of Muller Groep BV

Compliance with this Code is a fundamental condition of working with Muller Groep BV.

1. Safety: Our License to Operate

In high-risk operational environments, safety is not a target it is a prerequisite.

Muller maintains a structured occupational health and safety management framework built on:

- Systematic hazard identification
- Risk-based operational planning
- Clear method statements and lifting procedures
- Competency assurance
- Monitoring and verification
- Stop Work Authority for all personnel

Every individual involved in our projects has both the authority and the responsibility to intervene if unsafe conditions arise.

We expect our contractors and partners to demonstrate the same uncompromising commitment to safe operations.

2. Operational Excellence and Quality Assurance

Complex transport and marine lifting projects require engineering precision, controlled processes and disciplined execution.

Our quality management approach ensures:

- Clear project planning and defined responsibilities
- Controlled documentation and traceability
- Use of qualified and competent personnel
- Risk assessment prior to execution
- Monitoring of critical operational controls
- Structured handling of non-conformities
- Root cause analysis and corrective action
- Commercial pressure never justifies deviation from safety or quality standards

3. Environmental Stewardship

Operating in marine and industrial environments requires disciplined environmental management.

Muller Groep BV is committed to:

- Compliance with applicable environmental legislation
- Prevention of pollution and marine contamination
- Responsible waste handling
- Efficient use of energy and resources
- Monitoring and reduction of CO₂ emissions
- Continuous environmental performance improvement

We recognise our role in supporting both traditional energy operations and the energy transition, and we conduct our activities accordingly.

4. Integrity in Business Practices

Our reputation is built on trust and transparency.

We maintain zero tolerance for:

- Bribery and corruption
- Facilitation payments (unless legally required and formally approved)
- Fraud or falsification of documentation
- Anti-competitive behaviour
- Undisclosed conflicts of interest

All financial and operational records must accurately reflect the underlying transactions and be fully auditable.

If there is uncertainty regarding the legality or appropriateness of an action, the matter must be escalated before proceeding.

5. Responsible Supply Chain and Contractor Management

We operate within complex international supply chains. Therefore, we require our partners to meet standards equivalent to our own.

All subcontractors and suppliers must:

- Comply with applicable laws and regulations
- Meet agreed safety, quality and environmental requirements
- Maintain competent and qualified personnel
- Protect confidential information
- Respect internationally recognised human rights principles
- Cooperate during audits and compliance reviews

Accountability extends throughout the subcontracting chain.

6. Human Rights and Fair Working Conditions

We are committed to fair and respectful treatment of all individuals.

We do not tolerate:

- Forced or compulsory labour
- Child labour
- Harassment or discrimination
- Unsafe or degrading working environments

Respect for people is fundamental to sustainable and responsible project execution.

7. Risk Management and Governance

In oil & gas and offshore wind environments, structured governance and disciplined risk management are essential.

Muller Groep BV applies risk-based thinking across:

- Engineering and project execution
- Marine and lifting operations
- Environmental aspects
- Health and safety risks
- Contractual and regulatory compliance

Incidents, near misses and deviations are investigated systematically to identify root causes and prevent recurrence. Continuous improvement is embedded in our management approach.

8. Confidentiality and Information Protection

Our operations involve commercially sensitive and technically complex information.

We ensure:

- Protection of client data
- Secure handling of documentation
- Compliance with data protection regulations
- Respect for intellectual property

Confidentiality obligations continue beyond the completion of projects.

9. Reporting and Accountability

We promote a culture of openness and responsibility.

Any employee, contractor or partner who identifies:

- Safety concerns
- Environmental risks
- Ethical misconduct
- Legal non-compliance

is expected to report the matter promptly.

Reports made in good faith are protected from retaliation.

Non-compliance with this Code may result in corrective measures, suspension, contract termination or legal action.

Our Commitment

Muller Groep BV understands that in high-consequence industries, technical performance and ethical conduct are inseparable.

Through structured management systems aligned with internationally recognised standards for quality, environmental management and occupational health & safety, we ensure that:

- Risks are systematically controlled
- Compliance obligations are fulfilled
- Operational performance is monitored
- Improvement is continuous

We remain committed to delivering complex projects safely, responsibly and with integrity supporting both established energy operations and the global energy transition.